



SDMS DocID

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DEPARTMENT OF THE NAVY  
NAVAL RESEARCH LABORATORY  
4555 OVERLOOK AVE SW  
WASHINGTON DC 20375-5320

IN REPLY REFER TO

5100  
Ser 3540/0344

11 OCT 2006

Mr. Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Mr. Steinmetz:

The Naval Research Laboratory (NRL) is submitting this response to the Environmental Protection Agency's (EPA) request, dated April 18, 2006, concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Safety Light Corporation Site, Bloomsburg, Columbia County, Pennsylvania.

The information enclosed provides the details of an extensive review of available archived records. There is no indication that NRL ever sent radioactive materials to the Safety Light Corporation (SLC) site for disposal or that NRL ever brokered or disposed of such material on behalf of SLC.

If you have any questions or require additional information, please contact Ms. Debbie Cummings or Ms. Elisa Dowell at (202) 767-2232.

Sincerely,

STEVE HARRISON  
Director, Research and  
Development Services Division  
By direction of the  
Commanding Officer

Enclosure: NRL Response to EPA's Information Request

**Naval Research Laboratory (NRL) Responses to the Environmental Protection Agency's (EPA's) Information Request Regarding Safety Light Corporation**

**1. Describe in detail the business relationship between the NRL and Safety Light.**

The Naval Research Laboratory (NRL) conducts basic and applied scientific research including research on the properties of materials and the interactions of various types of radiation with matter. As an end-user of various types of radioactive materials, NRL obtained radioactive material shipments from Safety Light Corporation on four occasions in the early 1950's (per Safety Light Corporation historical records, Ledger Items 001179, 001224, and 001591 attached to EPA's letter dated 18 April 2006). NRL also received items from Safety Light Corporation or one of its affiliated companies as indicated in enclosure (2) and as follows: 7 tritium exit signs from Safety Light Corporation on 16 November 1981, 6 tritium exit signs from Safety Light Corporation on 22 January 1988, and 4 tritium exit signs from Isolite Corporation on 15 January 1988.

The Safety Light Corporation historical records provided by EPA to NRL do not indicate that Safety Light Corporation, its predecessor companies or affiliated companies ever received radioactive material from NRL.

On 8 June 1994, eleven (11) Safety Light Corporation signs and one (1) Isolite Corporation sign were transferred off site to the Defense Consolidation Facility operated by Chem-Nuclear Systems Inc. (near Snelling) Barnwell, South Carolina. On 5 June 1998, eleven (11) Safety Light Corporation signs were transferred off site to Self Powered Lighting, 169 Western Highway, West Nyack, NY 10994. On 26 November 2001, two (2) Isolite Corporation signs were transferred off-site to the Radioactive Material Recycling Program, 5490 Pearson Road, Wright-Patterson Air Force Base, Ohio. See enclosure (3).

The difference between the number of signs received (17) versus the number shipped out (22) may have been a result of double-signs, with the "Exit" sign viewable from both sides, being counted as a single sign coming in and as two separate signs going out; or, perhaps Health Physics made an error in recording the manufacturer. Many tritium, self-luminous exit signs were purchased from different manufacturers beginning in 1981 in an effort to save energy. As generally licensed items they were not required to be tracked by NRL at that time. However, NRL Health Physics personnel saw the value at that time of noting the locations of each sign and creating an inventory list.

**2. Did the NRL ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridges Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?**

No. NRL found no indication in its records that it ever transported or brokered hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by the above companies. See the response to question number 4

**Naval Research Laboratory (NRL) Responses to the Environmental Protection Agency's (EPA's) Information Request Regarding Safety Light Corporation**

regarding a summary of the documents reviewed. Transporting and brokering hazardous substances and/or radioactive waste or other wastes for other organizations is inconsistent with NRL's research mission and would have been inconsistent with NRL's mission during the period of interest (1945-present).

**3. If you answered "yes" to Question 2, please answer the following questions.**

Not applicable. NRL answered "no" to Question 2.

**4. Did the NRL ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S Radium, Lime Ridge Industries, USR Industries, USA Metals, Metreal or Isolite at the Site?**

No.

NRL Health Physics has no records pertinent to waste disposal practices for the period of 1945-1949. There is no indication that NRL radioactive waste or other wastes were disposed of or reclaimed by Safety Light Corporation, U.S. Radium, Lime Ridges Industries, USR Industries, USR Metals, Metreal or Isolite to the Safety Light Corporation Site in question during the 1945-1949 timeframe.

Enclosure (2) is NRL Report 4308, Environmental Aspects of the Naval Research Laboratory, dated February 23, 1954. Enclosure (4) provides a baseline regarding radioisotopes found in the environment. It indicates that "Disposal of radioactive waste at NRL is governed by a system of radiological safety regulations. Dry radioactive waste is placed in reinforced concrete vaults which are sealed with concrete when full. About once a year these vaults are taken by NRL trucks to Norfolk, Virginia, transferred to a vessel of the U.S. Coast Guard, and dumped in a specified deep disposal area some 100 miles off shore."

Per enclosure (5), Joe Pawlovich, then Supervisory Health Physicist and Radiation Safety Officer, conducted an investigation in March of 1999 regarding NRL's radioactive waste disposal practices in the 1950's and early 1960's. Waste was disposed of in conjunction with the National Bureau of Standards and the Coast Guard at sea, via the Navy at sea for a short period, at Oak Ridge, Tennessee, and near Idaho Falls, Idaho. Mr. Pawlovich spoke to Allen Brodsky who worked as a Health Physicist at NRL from 1950-1952 and Luis F. Garcia who worked as a Health Physicist at NRL from 1952-1962, among others included in enclosure (5). Mr. Garcia had emphasized that he had a "tight accounting of radioactive material." No one during this investigation indicated that any radioactive material or waste had been shipped to Safety Light Corporation, its predecessor companies or its affiliates.

**Naval Research Laboratory (NRL) Responses to the Environmental Protection Agency's (EPA's) Information Request Regarding Safety Light Corporation**

In early June 2006, John Patterson, US Navy Reservist, searched records to aid NRL Health Physics in a formulating a response to the EPA's request for information regarding the Safety Light Corporation Site.

Per enclosure (2), during the week of 26 June 2006 a review of files containing radioactive waste disposal documents [Standard Subject Identification Code (SSIC) 5100AP] and radioactive material shipments (SSIC 5100AR), located in NRL Buildings 83 and 57, was conducted. A review of all outgoing shipments and waste disposal documentation for the periods of 1966 – 20 December 1999 located in Building 83, and 21 December 1999 to current files, located in Building 57, did not show any records of transfer of radioactive materials to Safety Light Corporation or it's affiliates.

A request for information pertaining to the EPA Inquiry was sent to Mr. Dean Bundy, NRL's Archives Coordinator, Code 3460 from Mrs. Debbie Cummings, Assistant Radiation Safety Officer of NRL in April 2006. Mr. Bundy searched the indices to NRL records held at the Washington National Records (WNRC) in Suitland, Maryland for records dealing with the disposition of disposal of hazardous materials from the 1950s and did was not able to identify any that may have been related to the information request made in EPA's 18 April 2006 letter. Enclosure (6) is a summary of the findings. NRL records transferred to the WNRC office during the period 1986-1996 would not have included Health Physics records.

Elisa Dowell, NRL Health Physicist, reviewed the current NRL Health Physics Source Accountability database for Po-210, Pb-210 and Sr-90 and found none that were obtained from Safety Light Corporation, its predecessor companies or affiliates as listed in the EPA letter dated 18 April 2006.

While the Safety Light Corporation was an infrequent supplier to the Naval Research Laboratory, the available records do not indicate that this site has been a repository for storage of NRL radioactive waste.

The Polonium 210 (Po-210) indicated by EPA Ledger Item 001591, has a half-life of 138.4 days. This salt underwent adequate decay to transform into stable Lead-206 (Pb-206) during the late 1950s. Any radiological hazard associated with this salt would have ceased at that time.

Note: EPA Ledger Item 00153 indicates radioactive material shipped to National Research Corporation, of Cambridge, MA. National Research Corporation, which has supported the Department of Energy (DOE) atomic weapons effort, is not connected with NRL.

**5. If you answered "yes" to Question 4, please address the following issues:**

Not applicable. NRL answered "no" to Question 4.

**Naval Research Laboratory (NRL) Responses to the Environmental Protection Agency's (EPA's) Information Request Regarding Safety Light Corporation**

**6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, area of responsibility, current addresses, and telephone numbers of such persons as well as additional information.**

None.

Mrs. Debbie Cummings, Assistant Radiation Safety Officer / Supervisory Health Physicist, spoke to Mr. Allen Brodsky, who was a Health Physicist at NRL during 1950-1952, on 16 June 2006. Mr. Brodsky could offer no additional information regarding the Safety Light Corporation site referenced by the EPA. See enclosure (5). Mr. Brodsky did say that Mr. Luis F. Garcia, who worked as a Health Physicist at NRL from 1952-1962, had passed away about two years ago.

There are Health Physicists who had worked at NRL back to 1960 still alive, however, it is not expected that they will be able to offer additional information regarding the site.

**7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current address, and telephone numbers of the persons from whom such information or document may be obtained.**

Not applicable.

**8. If you have other information about other party (ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons, who you believe party may have contributed to the contamination at the Site or may have information regarding the Site.**

None.

**9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.**

See above. No other relevant documents are known to exist. Some documents likely were disposed of several years ago.

**DEPARTMENT OF THE NAVY**

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OFFICIAL BUSINESS

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